

**BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA**

**DOCKET NO. 2003-326-C**

IN RE:

Analysis of Continued Availability	)	<b>ITC^DELTACOM'S RESPONSE</b>
of Unbundled Local Switching for	)	<b>TO BELLSOUTH</b>
Mass Market Customers Pursuant	)	<b>TELECOMMUNICATIONS, INC.'S</b>
To the Federal Communication	)	<b>FIRST REQUEST FOR PRODUCTION</b>
Commission's Triennial Review Order	)	<b>OF DOCUMENTS TO</b>
	)	<b>ITC^DELTACOM AND BTI</b>

ITC DeltaCom Communications, Inc. d/b/a ITC^DeltaCom and BTI Corporation (hereinafter "ITC^DeltaCom"), pursuant to the Joint Motion for Initial Procedural Order filed by BellSouth and CompSouth on November 12, 2003, and S.C. Code Ann. Regs. 103-851 hereby submits the following Responses to BellSouth Telecommunications, Inc.'s First Request for Production of Documents to ITC^DeltaCom.

**REQUESTS FOR PRODUCTION**

1. Produce all documents identified in response to BellSouth's First Set of Interrogatories.

**RESPONSE:**

**All documents identified in response to BellSouth's individual interrogatories are marked as such and appended to the interrogatories subject to the corresponding interrogatory objections; the actual production of confidential information will be made solely pursuant to the forthcoming Protective Order of the South Carolina Public Service Commission.**

2. Produce every business case in your possession, custody or control that evaluates, discusses, analyzes or otherwise refers or relates to the offering of a qualifying service in the State of South Carolina.

**RESPONSE:**

**ITC^DeltaCom objects on the grounds that this request is overly broad, unduly burdensome, and seeks trade secrets.**

3. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in South Carolina to whom you only provide qualifying service.

**RESPONSE:**

**ITC^DeltaCom objects on the grounds that this request is overly broad, unduly burdensome, and seeks trade secrets. Additionally, ITC^DeltaCom does not have the information requested in the manner requested. Notwithstanding its objections, ITC^DeltaCom files consolidated financials with the Securities Exchange Commission.**

4. Produce all documents referring or relating to the average number of access lines you provide to end user customers in South Carolina to whom you only provide qualifying service.

**RESPONSE:**

**ITC^DeltaCom does not have the information requested in the manner requested.**

5. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in South Carolina to whom you only provide non-qualifying service.

**RESPONSE:**

**ITC^DeltaCom objects on the grounds that this information is not relevant or necessary, and this information is not readily available in the format sought.**

6. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in South Carolina to whom you provide both qualifying and non-qualifying service.

**RESPONSE:**

**ITC^DeltaCom objects on the grounds that this information is not relevant or necessary, and this information is not readily available in the format sought.**

7. Produce all documents referring or relating to the average number of access lines you provide to end user customers in South Carolina to whom you provide both qualifying and non-qualifying service.

**RESPONSE:**

**ITC^DeltaCom objects on the grounds that this request is overly broad and unduly burdensome. Notwithstanding its objection, ITC^DeltaCom will produce such confidential information pursuant to the terms of the forthcoming Protective Order.**

8. Provide all documents referring or relating to the classifications used by Company to offer service to end user customers South Carolina (e.g., residential customers, small business customers, mass market customers, enterprise customers, or whatever type of classification that you use to classify your customers).

**RESPONSE:**

**ITC^DeltaCom objects on the grounds that this request is overly broad and unduly burdensome. Notwithstanding its objection, ITC^DeltaCom categorizes end user customers as residential or business. See the ITC^DeltaCom and BTI tariffs.**

**Note: In the past, BTI categorized end user customers as residential, business, or government. See the ITC^DeltaCom and BTI tariffs.**

9. Produce all documents referring or relating to the average acquisition cost for each class or type of end user customer served by Company, as requested in BellSouth's First Set of Interrogatories, No. 34

**RESPONSE:**

**ITC^DeltaCom objects on the grounds that this request is overly broad, unduly burdensome, and seeks trade secrets.**

10. Produce all documents referring or relating to the typical churn for each class or type of end user customer served by Company, as requested in BellSouth's First Set of Interrogatories, No. 35.

**RESPONSE:**

**ITC^DeltaCom objects on the grounds that this request is overly broad, unduly burdensome, and seeks trade secrets.**

11. Produce all documents referring or relating to how Company determines whether to serve an individual customer's location with multiple DS0s or with a DS1 or larger transmission system.

**RESPONSE:**

**See response to Interrogatory No. 40**

12. Produce all documents referring or relating to the typical or average number of DS0s at which Company would choose to serve a particular customer with a DS1 or larger transmission system as opposed to multiple DS0, all other things being equal.

**RESPONSE:**

**See response to Interrogatory No. 40.**

13. Produce all documents referring or relating to the cost of capital used by Company in evaluating whether to offer a qualifying service in a particular geographic market.

**RESPONSE:**

**ITC^DeltaCom does not have any documents responsive to this request.**

14. Produce all documents referring or relating to the time period used by Company in evaluating whether to offering a qualifying service in a particular geographic market (e.g., one year, five years, ten years or some other time horizon over which a project is evaluated)?

**RESPONSE:**

**ITC^DeltaCom does not have any documents relating to whether a qualifying service in a particular geographic market will be offered in a certain time period. See response to Interrogatory 45. See the ITC^DeltaCom and BTI tariffs.**

15. Produce all documents referring or relating to your estimates of sales expense when evaluating whether to offer a qualifying service in a particular geographic market.

**RESPONSE:**

**ITC^DeltaCom does not have documents responsive to this request.**

16. Produce all documents referring or relating to your estimates of general and administrative ("G&A") expenses when evaluating whether to offer a qualifying service in a particular geographic market.

**RESPONSE:**

**ITC^DeltaCom does not have documents responsive to this request.**

17. Produce all documents referring or relating to any complaints by Company or its end user customers about individual hot cuts performed by BellSouth since January 1, 2000.

**RESPONSE:**

**On information and belief, BellSouth has all such documents.**

18. Produce all documents referring or relating to a batch hot cut process used by any ILEC in the BellSouth region that is acceptable to Company or that Company believes is superior to BellSouth's batch hot cut process.

**RESPONSE:**

**ITC^DeltaCom does not have any such documents in its possession at this time.**

19. Produce all documents referring or relating to an individual hot cut process used by any ILEC in the BellSouth region that is acceptable to Company or that Company believes is superior to BellSouth's individual hot cut process.

**RESPONSE:**

**ITC^DeltaCom does not have any such documents in its possession at this time.**

20. Produce all documents referring or relating to a batch hot cut process used by any ILEC outside the BellSouth region that is acceptable to Company or that Company believes is superior to BellSouth's batch hot cut process.

**RESPONSE:**

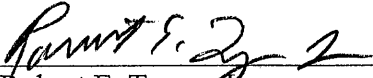
**ITC^DeltaCom does not have any such documents in its possession at this time.**

21. Produce all documents referring or relating to an individual hot cut process used by any ILEC outside the BellSouth region that is acceptable to Company or that Company believes is superior to BellSouth's individual hot cut process.

**RESPONSE:**

**ITC^DeltaCom does not have any such documents in its possession at this time.**

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December 17, 2003

**CERTIFICATE OF SERVICE**

I, the undersigned employee of the law offices of Sowell Gray Stepp & Laffitte, L.L.C., attorneys for ITC^DeltaCom, do hereby certify that I have a copy of the pleading(s) hereinbelow specified via e-mail to the following address(es):

**Pleadings:**     **ITC^DeltaCom's Response to BellSouth Telecommunication Inc.'s First Request For Production of Documents to ITC^DeltaCom and BTI**

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